



**Weinberger Divorce  
& Family Law Group**



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July 26, 2018

**Via Lawyers Service**

Honorable Susan D. Wigenton  
United States District Court  
District of New Jersey  
Martin Luther King Building & US Courthouse  
50 Walnut Street, Room 5060  
Newark, New Jersey 07101

**Re: Gerval v. Gonzalez**  
**Case No. 2:17-cv-12179-SDW-LDW**

Dear Judge Wigenton:

I represent Respondent in the above referenced matter. Enclosed, please find a courtesy copy of Respondent's Response to Law Guardian's Application simultaneously filed via ECF.

Thank you for your attention to this matter.

Respectfully Submitted,

**WEINBERGER DIVORCE &  
FAMILY LAW GROUP, LLC**

By: 

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(P) ALSO ADMITTED IN PENNSYLVANIA

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

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**In The Matter of C.G.**

**EMERIC GERVAL,**

**Plaintiff,**

**v.**

**Case No.:17cv-12179  
Honorable Susan D. Wigenton**

**RESPONDENT'S RESPONSE TO LAW  
GUARDIAN'S APPLICATION FOR  
DISMISSAL OF PETITION AND  
ALTERNATIVE RELIEF**

**NIURKA GONZALEZ**

**Respondent.**

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NIURKA GONZALEZ ("Respondent") through her undersigned counsel of record, *responds and joins* in the Law Guardian's Application, by way of the response herein:

1. Respondent admits the allegations contained in Paragraph 1 of the Law Guardian's Application and join's in Law Guardian's request for dismissal of Plaintiff's verified Complaint.
2. The allegations contained in Paragraph 2 of the Law Guardian's Application are not directed at Respondent, however, Respondent joins in the Law Guardian's position as to venue.
3. The allegations contained in Paragraph 3 of the Law Guardian's Application are not directed at Respondent, however, Respondent joins in the Law Guardian's statements of law.

4. Respondent admits any allegations contained in Paragraph 4 of the Law Guardian's Application and join's in Law Guardian's position and statements of law.
5. The allegations contained in Paragraph 5 of the Law Guardian's Application are not directed at Respondent, however, Respondent joins in the Law Guardian's position and statements of law.
6. Respondent admits the allegations contained in Paragraph 6 of the Law Guardian's Application.
7. Respondent admits the allegations contained in Paragraph 7 of the Law Guardian's Application.
8. Respondent admits the allegations contained in Paragraph 8 of the Law Guardian's Application.
9. Respondent admits the allegations contained in Paragraph 9 of the Law Guardian's Application.
10. Respondent admits the allegations contained in Paragraph 10 of the Law Guardian's Application and joins in the Law Guardian's position.
11. Respondent admits the allegations contained in Paragraph 11 of the Law Guardian's Application and joins in the Law Guardian's position.
12. Respondent admits the allegations contained in Paragraph 12 of the Law Guardian's Application.
13. Respondent admits the allegations contained in Paragraph 13 of the Law Guardian's Application and joins in the Law Guardian's position.

14. Respondent admits the allegations contained in Paragraph 14 of the Law Guardian's Application and joins in the Law Guardian's position as to acquiescence/consent and habitual residence.
15. Respondent admits the allegations contained in Paragraph 15 of the Law Guardian's Application.
16. Respondent is without knowledge or information sufficient to form a belief as to the allegations and assertions of law set forth in paragraph 16 of Law Guardian's application.

WHEREFORE, the Respondent respectfully joins in the Law Guardian's requests for relief pursuant to 42 U.S.C. 9001 et. seq.; joins in her request for a Final Order as set forth in her Application; and joins in Law Guardian's assertion of applicable Affirmative Defenses.

### **CERTIFICATION**

The undersigned certifies, under Local Civil Rule 11.2, based on information known to me to date, that the above-captioned matter in controversy is not the subject of any other action pending in any court, or of any pending arbitration or administrative proceeding. The undersigned further certifies that the within pleading was filed within the time prescribed by the Federal Rules of Civil Procedure.

Dated: March 7, 2018

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Kristy Lipari /s/\_\_\_\_\_  
Kristy Lipari (KL3196)  
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